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BY CM/ECF

May 24, 2021

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York

RE: *Azor-El, et al. v. City of New York, et al.*, 1:20-cv-03650-KPF (and related cases)
Written Motion of Sonal Bhatia to Appear Pro Hac Vice

Dear Judge Failla:

This firm represents various Plaintiffs in this pending set of related and consolidated cases regarding conditions at Rikers Island. At the hearing held on Plaintiffs' motion for a preliminary injunction, the Court has granted the oral motion of my partner Sonal Bhatia to appear *pro hac vice* in this matter. We are following up with a written motion for purposes of the record; just filed are Ms. Bhatia's motion, as well as declaration in support and certificates of good standing. The appropriate fee has been paid. The City had previously indicated they do not oppose admission of Ms. Bhatia.

We thank the Court for its consideration of this matter.

Respectfully submitted,

KEENAN & BHATIA, LLC

By: */s/ E.E. Keenan*
Attorneys for Plaintiffs

Cc: Counsel of Record (by ECF)